

In The Matter Of:
Wilson, et al v.
Lobaina Loyola, et al

Isidro Alex Lobaina Loyola
August 18, 2021

D'Amico & Associates, Inc.
Court Reporters & Videoconferencing
5855 Sandy Springs Circle #140, Atlanta, GA 30328
(770) 645-6111 or toll-free (888) 355-6111



Min-U-Script® with Word Index

Exhibit A

IN THE STATE COURT OF GWINNETT COUNTY
STATE OF GEORGIA

KENT WILSON and SHERRY)	
WILSON,)	CIVIL ACTION FILE
)	
Plaintiffs,)	NO.: 21-C-00283-S2
)	
vs.)	
)	
ISIDRO ALEX LOBAINA)	
LOYOLA, KING'S WAY USA)	
TRANSPORT, INC., FIRST)	
TIME TRANSPORT, INC.,)	
WESCO INSURANCE COMPANY,)	
ONE WAY HAULING EXPRESS)	
CO, OLD REPUBLIC INSURANCE)	
CO., JOHN DOE #1; JOHN DOE)	
#2; JOHN DOE #3; JANE DOE)	
#1; JANE DOE #2; JANE DOE)	
#3; ABC, INC.; and XYZ)	
CORPORATION,)	
)	
Defendants.)	
)	

Interpreted videotaped videoconference deposition of ISIDRO ALEX LOBAINA LOYOLA, taken on behalf of the Plaintiffs, pursuant to the stipulations contained herein, reading and signing of the deposition being waived, in accordance with the Georgia Civil Practice Act, reported remotely before Charna S. Perloe, Certified Court Reporter, on August 18, 2021, commencing at 11:48 a.m.

D'AMICO & ASSOCIATES, INC.
Court Reporters & Videoconferencing
5855 Sandy Springs Circle, Suite 140
Atlanta, Georgia 30328
(770) 645-6111
www.DamicoAssociates.com

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

INDEX TO EXAMINATIONS

EXAMINATION	PAGE
By Ms. Partridge	8
By Ms. Willis	33
By Mr. Allred	43

INDEX TO EXHIBITS

PLAINTIFFS ' EXHIBIT	DESCRIPTION	PAGE
P-1	Photograph	14

1 REPORTER DISCLOSURE OF NO CONTRACT

2
3 I, Charna S. Perloe, Certified Court
4 Reporter, do hereby disclose pursuant to Article
5 10.B of the Rules and Regulations of the Board of
6 Court Reporting of the Judicial Council of
7 Georgia that I am a Georgia Certified Court
8 Reporter. D'Amico & Associates/I was contacted
9 by the party taking the deposition to provide
10 court reporting services for this deposition;
11 D'Amico & Associates/I will not be taking this
12 deposition under any contract that is prohibited
13 by O.C.G.A. 15-14-37(a) and (b) or Article 7C of
14 the Board; and I am not disqualified for a
15 relationship of interest under the provisions of
16 O.C.G.A. 9-11-28(c).

17 There is no contract to provide reporting
18 services between myself or any person with whom I
19 have a principal and agency relationship nor any
20 attorney at law in this action, party to this
21 action, party having a financial interest in this
22 action, or agent for an attorney at law in this
23 action, party to this action, or party having a
24 financial interest in this action. Any and all
25 financial arrangements beyond my/D'Amico &
Associates's usual and customary rates have been
disclosed and offered to all parties.

This, the 27th day of August, 2021.

CHARNA PERLOE, CCR-A-457

FIRM DISCLOSURE OF NO CONTRACT

I, Kelly D'Amico, do hereby disclose pursuant to Article 10.B of the Rules and Regulations of the Board of Court Reporting of the Judicial Council of Georgia that D'Amico & Associates, Inc., was contacted by the taking attorney to provide court reporting services for this deposition and there is no disclosed contract that is prohibited by O.C.G.A. 15-14-37(a) and (b) or Article 7C of the Rules and Regulations of the Board for the taking of this deposition.

There is no contract to provide reporting services between D'Amico & Associates, Inc., or any person with whom D'Amico & Associates, Inc., has a principal and agency relationship nor any attorney at law in this action, party to this action, party having a financial interest in this action, or agent for an attorney at law in this action, party to this action, or party having a financial interest in this action. Any and all financial arrangements beyond D'Amico & Associates, Inc.'s usual and customary rates have been disclosed and offered to all parties.

This, the 27th day of August, 2021.

KELLY D'AMICO, CEO
D'AMICO & ASSOCIATES, INC.

1 APPEARANCES (via videoconference):

2
3 On behalf of the Plaintiffs:

4 BRITTANY M. PARTRIDGE, Attorney at Law
5 Andersen Tate & Carr, P.C.
6 1960 Satellite Boulevard
7 Suite 4000
8 Duluth, Georgia 30097
(770) 820-0900
bpartridge@atclawfirm.com

9 On behalf of Defendants Isidro Alex Lobaina Loyola and
10 First Time Transport, Inc.:

11 BENJAMIN H. HARBIN, Attorney at Law
12 Waldon Adelman Castilla Hiestand & Prout
13 900 Circle 75 Parkway
14 Suite 1040
Atlanta, Georgia 30339
(770) 953-1710
bharbin@wachp.com

15
16 On behalf of Defendant Wesco:

17 WILLIAM S. ALLRED, Attorney at Law
18 Barrickman, Allred & Young, LLC
19 5775 Glenridge Drive, NE
20 Suite E-100
Atlanta, Georgia 30328-5386
(404) 252-2230
wsa@bayatl.com

1 APPEARANCES CONTINUED (via videoconference)

2

3 On behalf of Old Republic Insurance Co.:

4 CHRISTOPHER S. ANTOCI, Attorney at Law
5 Swift Currie McGhee & Hiers, LLP
6 The Peachtree, Suite 300
7 1355 Peachtree Street, NE
8 Atlanta, Georgia 30309
9 (404) 888-6173
10 chris.antoci@swiftcurrie.com

8

9 On behalf of State Farm:

10 DONNA OVERHOLT WILLIS, Attorney at Law
11 Lynn Leonard & Associates
12 2400 Century Parkway
13 Suite 200
14 Atlanta, Georgia 30345
15 (404) 728-5400
16 donna.o.willis.c395@statefarm.com

14

15 Videographer:

16 Jess Wiggins

17

18 Spanish Interpreter:

18

19 Max Goldston

19

20 Also Present:

21 Sam Houston
22 Kristina Iakounina

22

23

24

25

1 (ON VIDEO RECORD.)

2 THE VIDEOGRAPHER: Today's date is
3 August 18, 2021, and the time is 11:48 a.m.
4 This will be the videotaped deposition of
5 Isidro Lobaina in the matter of Wilson,
6 et al. versus Lobaina, et al.

7 Will counsel presented please identify
8 themselves for the record.

9 MS. PARTRIDGE: Yes, this is Brittany
10 Partridge. I represent Mr. and
11 Mrs. Wilson.

12 MS. WILLIS: This is -- am I on?

13 MS. PARTRIDGE: You're on, Donna.

14 MS. WILLIS: Okay. I wasn't sure.

15 This is Donna Wilson. I represent
16 State Farm.

17 MR. HARBIN: Ben Harbin. I'm here on
18 behalf of defendant Isidro Loyola and First
19 Time Transport.

20 MR. ANTOCI: Chris Antoci, here on
21 behalf of Old Republic Insurance Company.

22 MS. PARTRIDGE: And Mr. Allred may
23 have left the room. But he represents
24 Wesco Insurance Company.

25 THE VIDEOGRAPHER: Thank you.

1 Would you the court reporter please
2 proceed.

3 (The Spanish interpreter was remotely
4 sworn by the court reporter.)

5 (All answers are given through the
6 interpreter unless otherwise indicated.)

7 ISIDRO ALEX LOBAINA LOYOLA,
8 having been first duly sworn, was examined and testified
9 remotely through the Spanish interpreter as follows:

10 EXAMINATION

11 BY MS. PARTRIDGE:

12 Q Thank you, Mr. Loyola.

13 As I said, my name is Brittany Partridge.
14 I'll be taking the deposition today for Mr. and
15 Mrs. Wilson. Mr. Wilson --

16 MS. PARTRIDGE: Go ahead.

17 BY MS. PARTRIDGE:

18 Q Can you please state your full name.

19 A Isidro Alex Lobaina Loyola.

20 Q Do you go by any other names?

21 A Yes. That's my middle name, Alex; Isidro Alex
22 Lobaina Loyola.

23 Q Would you prefer that I call you
24 "Mr. Lobaina"?

25 A That's fine.

1 Q Are you aware of any obstacles that may
2 prevent you from being able to understand the questions
3 I'm asking you today?

4 A No. There's no obstacles, just if whoever the
5 lawyer is, I'll just ask for you to repeat.

6 Q No problem.

7 Do you understand that your testimony will be
8 the same as if given in court?

9 A It's the same as we did last time. I
10 understand it.

11 Q When you say "last time," are you referring to
12 the deposition in the Freddie Cagle case?

13 A The one that I had in person in Atlanta.

14 Q Okay. When did you give that deposition?

15 A I can't remember. I don't remember. But it
16 was there.

17 Q Was it at your attorney's office?

18 A I think it was there, yes.

19 Q Have you given any other depositions?

20 A No.

21 Q Okay. If you do not understand my question, I
22 just ask that you let me know, and I will try to ask it
23 in a way that you can understand.

24 A That's fine.

25 Q Do you have any questions before we go

Isidro Alex Lobaina Loyola - August 18, 2021

1 further?

2 A No.

3 Q Is there anybody -- I see you're outside. Is
4 there anybody outside with you?

5 A No. They're in the house.

6 Q Who is in the house?

7 A There's a woman who -- here who's going to go
8 to work right now.

9 Q Is that your wife?

10 A No. No, no. She's in Cuba.

11 Q Where are you at right now?

12 A Here at home, but there's another woman here
13 who is with my sister. My sister's working, and -- and
14 the woman is going to work.

15 Q What is your current address?

16 A So [REDACTED]

17 [REDACTED].

18 Q And you stated your spouse is in Cuba?

19 A Yeah. She's in Cuba.

20 Q Was she in Cuba in July of 2019?

21 A Yes. She lives there.

22 Q Did you live at your current address in July
23 of 2019?

24 A I've been living here for years. I'm old.

25 Q Do you have any social media accounts?

1 A I have it, but that's personal.

2 Q I understand it's personal. But we still need
3 to know what social media accounts that you have.

4 A I only have Facebook and YouTube.

5 Q What name do you go by on Facebook?

6 A The same one.

7 Q Your full name?

8 A I don't remember what I put, but I think so.

9 Q And what name do you use on YouTube?

10 THE INTERPRETER: I'm sorry. The
11 interpreter is having a hard time
12 understanding. It's a bad connection.

13 A (Through the Interpreter) The same one. I
14 think it's the same one because it's been a long time.

15 Q And how old are you, Mr. Lobaina?

16 A 54.

17 Q Okay. You were involved in a wreck on July
18 16th, 2019. Do you remember that wreck?

19 A I remember the accident.

20 THE INTERPRETER: Interpreter needs
21 clarification.

22 A (Through the Interpreter) The name of the
23 truck is -- in Cuban is "Rostra," a Cuban term
24 specifically.

25 Q So you do remember being involved in that

1 wreck on July 16th, 2019?

2 A I don't remember the date, but I do remember
3 that I had the accident in Atlanta, Georgia, on
4 Interstate 55 -- 85.

5 THE INTERPRETER: Excuse me.

6 BY MS. PARTRIDGE:

7 Q On that day, do you recall rear-ending
8 Mr. Wilson, who was driving a van?

9 A Yes. I spoke to Mr. Wilson, and he said -- he
10 said he was in a band. He's a musician, and he hit his
11 lip, and now he can't play.

12 Q Okay. Before we get into what happened after
13 you hit him, I want to talk about where you were coming
14 from.

15 A Look, I don't remember. I think I was coming
16 from South Carolina on 85.

17 Q Do you remember if you picked up a load in
18 South Carolina?

19 A That day, the load was plastic -- they were
20 plastic pallets. It was a heavy load. It was a big
21 load.

22 Q And you picked up that load in South Carolina?

23 A I don't remember well. I remember it was
24 South Carolina, and I remember the crash.

25 Q So do you know the company or address of where 12

1 you picked up the load?

2 A That time to this time, who could remember
3 something like that.

4 Q Do you know who would have paperwork for that
5 load?

6 A You would have to ask and find Ariel, Ariel,
7 Ariel Calzada, who is the owner.

8 Q What does Ariel Calzada own?

9 A The whole company -- the whole company that I
10 work for there. I sent that to the lawyer.

11 Q Who did you believe you were working for that
12 day?

13 A Ariel.

14 Q What company did you believe that you were
15 working for that day?

16 A He'd pick up loads.

17 THE INTERPRETER: The interpreter is
18 speaking. There's a difficulty. There's a
19 very bassy sound coming through. So I have
20 to ask for repetition. I'm sorry.

21 MS. PARTRIDGE: No problem.

22 A (Through the Interpreter) He'd pick up the
23 load with different companies, and then on the sign of
24 the truck, there would be a different name of a
25 different company.

1 Q Tell me the names of the companies you worked
2 for in July of 2019.

3 A I'm not sure if it was First Time or King's --

4 Q King's Way?

5 A King's Way.

6 I'm not sure if that was First Time or King's
7 Way, but those were the companies that he had at that
8 time.

9 Q Okay. You also received payments from One Way
10 Hauling Express; is that correct?

11 A I don't remember the checks I received. I
12 sent check stubs or receipts to the lawyer.

13 I also sent him some receipts from 2015 from
14 King's Way.

15 Q I'm going to show you what's going to be
16 marked as Plaintiff's Exhibit 1.

17 (Plaintiffs' Exhibit [P-1](#) was marked.)

18 BY MS. PARTRIDGE:

19 Q Do you recognize this as the truck you were
20 driving on July 16th, 2019?

21 A Can I press on the screen?

22 MS. PARTRIDGE: He can touch it.

23 A (Through the Interpreter) Ya, ya.

24 Q So you do recognize this as the truck you were
25 driving on July 16th, 2019?

1 A Looks like it. But it's been -- but it's been
2 a long time.

3 The impact was on the other side. So the
4 dent -- I'm not sure. It looks like it. It's white,
5 and that's the one I drove.

6 Q Are you stating that the damage as shown in
7 this photograph is not from you rear-ending Mr. Wilson?

8 A I can't remember. I do know that the
9 windshield from -- I just know that the window of the
10 codriver broke as well.

11 Q Did you have anybody in the vehicle with you?

12 A The codriver. He was sleeping.

13 Q What is the codriver's name?

14 A I can't remember because it was only a second
15 trip with me.

16 Q Did your codriver work for Mr. Calzada?

17 A Yes.

18 Q I'm going to come back.

19 On this truck that you were driving that day,
20 do you agree that the "First Time Transport" sticker
21 was on the side?

22 A I can't remember. Now I'm seeing that it got
23 "First Time," and we were taking loads from King's Way.

24 Q Did you place this sticker on the side of the
25 truck that day?

1 A No. He puts that -- they're his trucks.

2 Q When you say "his trucks," do you mean
3 Mr. Calzada?

4 A Yes, yes.

5 Like, 15 or 20 tractor.

6 Q Was this your codriver that I'm pointing to
7 with the blue hat?

8 A I can't remember. I don't think he was
9 wearing a hat. I don't know.

10 Q Is this you?

11 THE INTERPRETER: The interpreter
12 would like to make a rule, if I can, to
13 make sure that the -- that Mr. Lobaina
14 doesn't speak when other people are
15 speaking.

16 THE WITNESS: Okay.

17 BY MS. PARTRIDGE:

18 Q Mr. Loyola, is this you?

19 A I think that's me. I think that's me. I see
20 my sandals there. I think when the tow truck was
21 there -- I don't remember well, because now I'm here.
22 I'm looking, and I can't see it well.

23 Q Okay. Mr. Loyola, where did you originally
24 pick up the truck?

25 A At the yard that he has there, off of 154

1 and -- I think that's where he had his yard and where
2 the truck was.

3 Q What city was the truck lot in?

4 A Marlen, Marlen Gardens. I think it's Marlen
5 Gardens in Miami, Florida.

6 Q And when you say "he," are you referring to
7 Mr. Calzada?

8 A Yes. He's the owner.

9 Q So in July of 2019, you worked for First Time
10 Transport, King's Way, and One Way Hauling Express?

11 A I know -- I know those three companies.

12 The lawyer has a contract from 2015, I
13 think -- 2015, yeah. Let me see. Yeah. Here it is.
14 Here it says "King's Way."

15 Q King's Way was 2015, you stated?

16 A He's always had several companies in other
17 people's names.

18 Q Okay. What I'm focusing on today is July
19 16th, 2019, and it's important that we understand who
20 you were working for that day.

21 Did you ever -- did you ever ask Mr. Calzada
22 what insurance company he had?

23 A He would check to see if the insurance would
24 accept me or not. I never asked him.

25 Q Do you know what insurance company Mr. Calzada 17

1 used in July of 2019 for his trucking companies?

2 A Look, I don't know which companies. What I do
3 know, every driver that drives or that I've driven with
4 drives with insurance.

5 Q And do you know any of the insurance company
6 names that cover those drivers that you've driven with?

7 A I don't know any names or any one of the
8 insurance companies.

9 Q Do you have to provide proof of insurance when
10 you are transporting a load to anyone?

11 A They put the insurance on the paperwork of the
12 truck. So he has all -- he would keep all the
13 paperwork --

14 THE INTERPRETER: Interpreter needs
15 clarification.

16 A (Through the Interpreter) When I had the
17 accident, he left me there. Okay. I had to fend for
18 myself. I had to pay for hotels.

19 And the people from the accident, they took
20 me -- they left -- they took me to the yard where the
21 truck was taken, and then they took me to a stop, a
22 stop where the truck -- where the trucks park.

23 Q When you say he left you there, are you
24 referring to Mr. Calzada?

25 A No. I'm referring to Ariel Calzada.

1 Q Is Ariel Calzada a woman?

2 A He's a man. His wife is Isabel.

3 Q Is it Isabel Cordero?

4 A I think so. I don't know the last name.

5 Q Do you still speak to Mr. Calzada?

6 A No. The last time I saw him was in the yard,
7 and he spoke to me because I have a truck there.

8 Q Do you know where Mr. Calzada lives currently?

9 A No. I never went to his house.

10 Q It's your understanding that Mr. Calzada would
11 have any paperwork from your load on July 16th, 2019?

12 A Of course. Everything has to go through him
13 because he's the owner.

14 Q Was he the only one -- was Mr. Calzada the
15 only one who came to the yard that day with you?

16 A What day?

17 Q July 16th, 2019, the day of the wreck.

18 A I don't understand the question you're asking
19 because I didn't see Ariel until two months later when
20 he came back from Cuba.

21 Q You stated the last time you saw Mr. Calzada
22 was at the yard; is that correct?

23 A Yes, after he came back from Cuba. I'm not
24 sure if it was two months or more.

25 Q So do you know if Mr. Calzada ever went to the 19

1 Seymour Trucking and Towing yard in Georgia?

2 A You mean if he moved to Georgia?

3 Q No.

4 After the wreck, you stated you were taken to
5 a tow yard; is that correct?

6 A Yes, yes.

7 Q Did anyone come to the towing yard on July
8 16th, 2019, to see you?

9 A The people that were doing the towing took me
10 there, and then they took me to a truck stop.

11 Q What happened to your codriver?

12 A He stayed there, and -- and another driver
13 picked him up.

14 THE INTERPRETER: Interpreter needs
15 repetition.

16 A (Through the Interpreter) We paid for the
17 room. I left. He stayed there. Another driver went
18 to pick him up in a different truck.

19 Q Who picked you up from the hotel?

20 A No one. My nephew -- I went to a taxi stop on
21 the other side, and my nephew paid for a bus.

22 Q Okay. Is the last time you worked for King's
23 Way, One Way, or First Time Transport July 16th, 2019?

24 A I don't remember. Since I had the accident, I
25 didn't work for them.

1 Q Who do you work for now?

2 A No. My nephew's truck is broken. I'm working
3 independently.

4 Q Do you have a company?

5 A I had two companies, but I closed them some
6 time ago.

7 Q What were the names of those companies?

8 A Let's see if I can remember. One was called
9 Alex LL Corporation. The other was CHR Corporation. I
10 don't remember well.

11 Q Did you register these companies in Florida?

12 A Yes.

13 Q Did you own these companies with
14 Mr. Cordero -- excuse me -- Ms. Cordero or Mr. Calzada?

15 A No. The company, I had -- I started before I
16 worked for Ariel. They were two companies.

17 Q Did you have insurance with those companies?

18 A Of course. All the insurance companies, the
19 first company, when I opened it, had an insurance
20 coverage of a million dollars.

21 Q With what insurance company?

22 A I can't remember. It's been many years.

23 Q Okay. When did you close your Alex LL Corp.
24 and CHR Corp. companies?

25 A I don't remember. It's been many years.

1 Q Did you close them before or after the July
2 16th, 2019, wreck with Mr. Wilson?

3 A No. Many years ago.

4 Q Is that before or after the car wreck in July
5 of 2019?

6 A Before working for Ariel.

7 Q Who did you work for after Ariel?

8 A After working, I remember driving my niece's
9 truck -- my niece's truck. The name of the company --
10 I don't remember well -- was Gaber's. Gaber's
11 (phonetic).

12 THE INTERPRETER: The interpreter is
13 hearing a very loud noise. I can't -- it's
14 very difficult.

15 MS. PARTRIDGE: Can he maybe unplug
16 and plug his headphones in?

17 That fixed it. Now it's back.

18 MR. ALLRED: Is that a ceiling fan?

19 THE VIDEOGRAPHER: Do y'all want to go
20 off record?

21 MS. PARTRIDGE: Yes, please.

22 THE VIDEOGRAPHER: The time is 12:31
23 p.m. We are off video record.

24 (OFF VIDEO RECORD.)

25 (Recess from 12:31 p.m. to 12:31 p.m.)

1 (ON VIDEO RECORD.)

2 THE VIDEOGRAPHER: The time is 12:31

3 p.m. We are back on video record.

4 BY MS. PARTRIDGE:

5 Q Okay. Mr. Lobaina, I just want to summarize
6 what I have learned from you today, and tell me if I'm
7 stating anything that's incorrect. Okay?

8 A Okay.

9 Q On July 16th, 2019, you worked for
10 Mr. Calzada; is that correct?

11 A That's correct. I worked for him for several
12 years.

13 Q You are unsure of what company you were
14 working for on July 16th, 2019; is that correct?

15 A I said I think it was King's Way for the load
16 and then First Time for the other. I don't remember
17 well.

18 Q When you say "King's Way for the load," is it
19 your understanding you picked up the load in South
20 Carolina for King's Way?

21 A He picked up the load in King's Way's name,
22 and I think First Time was what was placed on the
23 truck. I don't remember. It's been a long time, the
24 names.

25 Q Do you know what company paid you for picking 23

1 up that load on July 16th, 2019?

2 A I don't remember, because I don't have the
3 receipt.

4 Q Do you know if you were paid for the load that
5 you picked up on July 16th, 2019?

6 A No. They didn't pay me anything.

7 Q Are you aware of any insurance companies that
8 insured King's Way in July of 2019?

9 A No. That -- Ariel knows all of that.

10 Q Do you -- did you in July of 2019 carry
11 personal auto insurance?

12 A No. All the companies that I've always worked
13 for always check my license to see if they will accept
14 me -- their insurance will accept me. And I work with
15 the insurance. If they can't get me on the insurance,
16 I won't work.

17 Q So you did not have personal auto insurance in
18 July of 2019?

19 A No. Since I have my own company, I've never
20 taken out any other insurance.

21 Q Did you understand Old Republic Insurance to
22 insure your load on July 16th, 2019?

23 A No. I know nothing about the insurance. I
24 just look at the paperwork. And in the booklet in the
25 truck, you check to make sure if there's insurance, and

1 that's it.

2 Q Do you remember any names of any insurance
3 companies in the booklet on July 16th, 2019?

4 A No.

5 Q Did you see the name Wesco Insurance Company
6 in the booklet on July 16th, 2019?

7 A I only look at the insurance page, and I don't
8 remember anything else.

9 Q The day of the wreck, on July 16th, 2019, did
10 you give this insurance page to the police?

11 A No. They didn't ask me for it.

12 Q Did you talk to the police -- go ahead.

13 A Excuse me. From what I can remember, they
14 didn't ask me for it. From what I remember, they
15 didn't ask me for it.

16 Q Going back to the day of the wreck, on July
17 16th, 2019, did you speak to the police after you
18 collided with Mr. Wilson?

19 A The police is the one who asked me for the
20 registration for the truck.

21 Q Did you give the police any documentation
22 aside from the registration that day?

23 A They asked me for my license as well. I don't
24 remember well.

25 Q Were you hurt in the wreck on July 16th, 2019?

1 A No.

2 Q Was your codriver injured in the car wreck on
3 July 16th, 2019?

4 A No.

5 Q Did you notice that Mr. Wilson was injured the
6 day of the wreck?

7 A No. He told me that he had -- was -- he had
8 hit his lip and that he was a trumpet player and that
9 "I'm a musician."

10 Q So you did not see Mr. Wilson's mouth bleeding
11 that day?

12 A I don't remember.

13 Q Before impacting with Mr. Wilson's van, what
14 were you -- let me take that back.

15 When you were on 85 that day, before you
16 rear-ended Mr. Wilson, what were you doing?

17 A Nothing. Nothing. I was driving on the left.
18 A car or two got in front of me. So I turned -- I went
19 over to the right.

20 Q Were you on the phone prior to rear-ending
21 Mr. Wilson?

22 A I don't talk to anyone. When I'm working, I
23 don't talk.

24 Q Were you texting when you impacted Mr. Wilson?

25 A No, that neither.

1 Q Did you fall asleep prior to crashing into
2 Mr. Wilson?

3 A No. When I -- when I went over to the right,
4 the traffic in front had stopped 40 or 50 feet in front
5 of me, and I don't know why. And I was driving a heavy
6 truck.

7 Q Did you apply your brakes prior to impacting
8 with Mr. Wilson?

9 A Yes. I tried to stop, but I couldn't.

10 Q You would agree with me that Mr. Wilson did
11 not do anything wrong to cause the wreck?

12 MR. HARBIN: Before he answers, I'm
13 going to object to the form of the
14 question. But he can answer.

15 THE INTERPRETER: Interpreter needs
16 repetition of the question.

17 Excuse me. You have to tell the
18 lawyer first.

19 Interpreter does need repetition of
20 the question.

21 MS. PARTRIDGE: No problem.

22 BY MS. PARTRIDGE:

23 Q You would agree with me that Mr. Wilson did
24 not do anything wrong to cause the wreck; correct?

25 A Look, what I do know is that when you brake

1 with a heavy truck, it -- it's hard to -- okay.

2 THE INTERPRETER: Interpreter needs
3 clarification.

4 A (Through the Interpreter) When a truck is
5 very heavy and it has a heavy load -- I was going 65,
6 67 miles an hour -- it's not easy to stop a truck,
7 because it's heavy too. That's what I do know.

8 Q You stated you spoke to the police officer
9 after the wreck; correct?

10 A Whenever someone has an accident, the police
11 come to ask for the truck's paperwork.

12 Q How many wrecks have you been in, Mr. Loyola?

13 A Just stating that that's the correct thing for
14 an accident.

15 Q And I apologize for calling you "Mr. Loyola."

16 Mr. Lobaina, how many wrecks have you been in
17 prior to the July 16th, 2019, wreck?

18 A I haven't had any accidents before this one.
19 All I'm saying is that when there is an accident and a
20 police officer will come and when they stop you too,
21 they will come over and ask you for your papers.

22 Q So to confirm, you've never been in a car
23 wreck prior to the one with Mr. Wilson on July 16th,
24 2019?

25 A What I can remember, never.

1 Q You received a citation as a result of the
2 wreck; correct?

3 A Yes. And -- and I fixed it, and I paid it at
4 court.

5 Q Did you personally go to court in Georgia for
6 your ticket?

7 A Yes, because that's where I had to go.

8 Q Did you have an attorney to represent you for
9 your citation?

10 A No. There was no lawyer. There was someone
11 who spoke Spanish and -- the court. I didn't have a
12 lawyer. Directly with the prosecutor, I think.

13 Q After the wreck, we know that you spoke to the
14 police officer and Mr. Wilson. Did you speak to
15 anybody else?

16 A Not from what I can remember.

17 Q Did you call anybody after the wreck?

18 A Look, I can't remember if I called Ariel or it
19 was the other way around. I don't remember well.

20 Q You did speak to Ariel after the wreck;
21 correct?

22 A I don't remember well. What I do remember is
23 the last time I saw Ariel was in the yard here where he
24 has his trucks.

25 Q So you do not remember if you spoke to Ariel

1 directly after the car wreck with Mr. Wilson?

2 A I don't remember, because two days after, my
3 head --

4 THE INTERPRETER: Interpreter needs
5 clarification.

6 A (Through the Interpreter) My brother died,
7 and a lot of things have happened to me.

8 Q I'm sorry. I'm sorry for your loss,
9 Mr. Lobaina.

10 Do you know who paid for the truck and trailer
11 to be taken from the tow yard?

12 A No. That always has to do with the company.
13 I don't know.

14 Q And you don't know what company paid for the
15 truck and trailer to be picked up from the tow yard;
16 correct?

17 A No, no.

18 Q Did any insurance companies reach out to you
19 about this wreck on July 16th, 2019?

20 A I don't remember. They sent paperwork, but I
21 wasn't here. I was in Cuba. But I don't remember.

22 Q So you do not remember the company that sent
23 you paperwork?

24 A I don't remember well, who sent the paperwork,
25 whether it was the insurance or was from the court. I

1 can't find that paperwork.

2 Q Aside from First Time Transport, King's Way,
3 and One Way Hauling Express, were there any other
4 companies you worked for on July 16th, 2019?

5 A After that?

6 Q No. On the day of the wreck.

7 A No. I've only been working for Ariel four,
8 five, six years. I don't remember well.

9 Q Do you know why Mr. Calzada and Ms. Cordero
10 are not responding to any communications about this car
11 wreck?

12 A I don't know. It must be because they don't
13 want to pay. That's the way -- that's the way they
14 were with their workers. I worked with them for
15 several years, and they would leave us -- they left me
16 up there planted.

17 Q What was the last address you knew where they
18 operated their businesses out of?

19 A I don't remember well, but that was the
20 perimeter of Okeechobee, 103, 105, there.

21 Q Are you aware of any lawsuits against
22 Mr. Calzada or Ms. Cordero?

23 A I don't know anything. Since the accident, I
24 only talked to him when he came back from Cuba two
25 months ago -- I don't know -- at the yard.

1 Q Can you repeat for me where the yard was
2 located?

3 A Okeechobee off of 154 Merlin. I think it's
4 Merlin. Merlin.

5 MS. PARTRIDGE: I believe that's all
6 the questions I have for you, Mr. Lobaina.
7 Thank you for your time today. Again, I am
8 sorry to hear about your brother.

9 THE WITNESS: They were two brothers.
10 That's fine. Excuse me.

11 MS. PARTRIDGE: I do -- I'm sorry. I
12 do apologize about that. I'm sorry to hear
13 about your brothers.

14 THE WITNESS: Thank you.

15 MS. PARTRIDGE: I believe Ms. Willis
16 may have some questions for you along with
17 other counsel.

18 MS. WILLIS: Yes, I do have -- I do
19 have some questions. May we take about a
20 five- to ten-minute break?

21 MS. PARTRIDGE: Sure. Do you want to
22 meet back at 1:10?

23 MS. WILLIS: That would be great.

24 MS. PARTRIDGE: Okay. Thank you.

25 THE VIDEOGRAPHER: The time is 1:00

1 p.m. We are off video record.

2 (OFF VIDEO RECORD.)

3 (Recess from 1:00 p.m. to 1:10 p.m.)

4 (ON VIDEO RECORD.)

5 THE VIDEOGRAPHER: The time is 1:10

6 p.m. We are back on video record.

7 EXAMINATION

8 BY MS. WILLIS:

9 Q Okay. Mr. Lobaina, my name is Donna Willis.
10 I represent State Farm Mutual Automobile Insurance
11 Company, and I'm going to ask you additional questions
12 about the incident and about your relationship with
13 Ariel Calzada.

14 How long --

15 THE INTERPRETER: Excuse me.

16 MS. WILLIS: Oh, gosh. I keep
17 forgetting. Sorry. You'll have to remind
18 me.

19 A (Through the Interpreter) Good afternoon.
20 That's fine.

21 Q All right. When did you first meet Ariel?

22 A I've known Ariel for years. He learned how to
23 drive with the company that -- that I learned to drive
24 with.

25 Q Did you meet in a driving class?

1 A No. I knew him -- I knew him from other
2 people. He learned from a driver that I taught from
3 some people that I know.

4 Q Okay. Do you and Ariel have any relatives in
5 common?

6 A No.

7 Q Are you still in touch with any friends of
8 Mr. -- of Ariel's?

9 A No.

10 Q Why were you and Ariel at the truck yard in
11 Florida some months after the accident?

12 A Because I've had my truck -- I've had my truck
13 there -- stopped there seven years, and he has his
14 trucks there.

15 Q Did Ariel have your truck insured under one of
16 his policies?

17 A No. My truck has been stopped there for seven
18 years.

19 Q Oh. It has not been running for the seven
20 years before you saw Mr. -- saw Ariel at the truck
21 yard?

22 THE INTERPRETER: Interpreter is
23 having a hard time hearing.

24 A (Through the Interpreter) So I parked my
25 truck with Ariel, and I -- I had it parked there. I

1 don't know how many years it's been.

2 Q Why did you need to talk with him the day you
3 met him after the accident?

4 A No. He just left me stranded. I'm the one
5 who talked to him. He left me stranded.

6 MS. PARTRIDGE: Donna, I believe you
7 froze again.

8 BY MS. WILLIS:

9 Q I think I'm confused.

10 MS. WILLIS: Am I okay now?

11 THE INTERPRETER: Yes.

12 BY MS. WILLIS:

13 Q Okay. If I understand your testimony, you saw
14 Ariel one time after the accident in 2019; is that
15 right?

16 A After he came back from Cuba, yes.

17 Q Okay. Why did you and Ariel need to meet that
18 day?

19 A Because I had my truck there, and he was
20 coming out of his car, and he saw me.

21 Q Were you there to move your truck?

22 A That's where I've been parking my truck for
23 several years.

24 Q Does Ariel own the truck lot?

25 A No. He has 15 or 20 trucks there or had. I

1 don't know.

2 Q Have you been -- how many times have you been
3 back to that truck lot since the time you ran into
4 Ariel?

5 A Always, almost always. My truck is there.

6 Q Have you seen Ariel's trucks on the lot when
7 you've gone back to get your truck?

8 A Look, I think they have moved, because I
9 haven't seen them there.

10 Q How long has it been since you have seen
11 Ariel's trucks?

12 A Long time, a year. I don't remember well.

13 Q Is your wife related to anyone -- to Ariel or
14 his wife?

15 A No.

16 THE INTERPRETER: The interpreter is
17 having a hard time. There's some noise in
18 the background.

19 (Witness and interpreter conferring.)

20 THE INTERPRETER: I'm still hearing
21 it.

22 (Witness and interpreter conferring.)

23 THE INTERPRETER: Okay. So we just
24 had to clear up the noise in the
25 background.

1 MS. WILLIS: Okay.

2 THE INTERPRETER: The Spanish
3 interpreter is speaking, yes.

4 BY MS. WILLIS:

5 Q I think you told me your wife is not related
6 to anyone in Ariel's family; is that correct?

7 A No one, no one.

8 Q Did you -- have you ever seen Ariel in Cuba?

9 A No. We live in different cities. My wife and
10 I -- my wife and I live in different cities.

11 THE VIDEOGRAPHER: This is the
12 videographer. I apologize for
13 interrupting. Is there a light in the room
14 that he could turn on his face? We cannot
15 see his face at all.

16 THE INTERPRETER: Is that good?

17 THE VIDEOGRAPHER: It looks about the
18 same. If we can't fix it, it's okay. We
19 can keep going.

20 THE INTERPRETER: He just asked -- he
21 just asked if you want me to go outside
22 again.

23 MS. PARTRIDGE: Certainly better, for
24 sound purposes, than staying inside.

25 If he can just move his phone to the

1 right or the left, that may help.

2 THE WITNESS: I'm going to move the
3 table and put myself over there.

4 MS. WILLIS: That's good.

5 THE VIDEOGRAPHER: Much better. Thank
6 you.

7 THE WITNESS: You're welcome.

8 THE VIDEOGRAPHER: Please proceed,
9 ma'am. I'm sorry to interrupt.

10 MS. WILLIS: I'm sorry. Okay. No
11 problem.

12 BY MS. WILLIS:

13 Q I am confused about whether on the date of the
14 accident, July 16th, 2019 (audio distortion), there was
15 anyone -- was there a codriver?

16 THE INTERPRETER: The interpreter is
17 speaking. Your connection is breaking up.
18 I think I know what your question is, but
19 there was too much of a -- there was too
20 many breakups. So you're going to have to
21 repeat it. I'm so sorry.

22 MS. WILLIS: Oh. That's all right.

23 BY MS. WILLIS:

24 Q Just I would like to know if there was a
25 codriver on July 16th, 2019.

1 A Yes.

2 Q What is the name of the codriver?

3 A I don't know. He's only worked with me twice.
4 That's it.

5 Q After the accident, where did the codriver go?

6 A I don't know. We ended up in the same hotel
7 room, and then I left, and then another driver went to
8 pick him up. I don't know.

9 Q What did you call this man?

10 A I don't know. I don't remember. I only saw
11 him twice.

12 Q Okay. And you testified that Ariel would
13 check with his insurance companies before giving you a
14 truck to drive; correct?

15 A Always. All the companies check to see if the
16 insurance will take us, and I've always waited to see
17 if they'll take me.

18 Q Did Ariel check with an insurance company each
19 time he gave you a truck to drive?

20 A Every time -- every time you change trucks,
21 you change insurance.

22 Q Okay. So --

23 A I don't remember well if he changed companies.
24 I don't know. I don't -- I know that he would always
25 check. Whenever I had a job with him, he would check

1 with the insurance. I'm not -- I'm not sure if he
2 changed it or not, but he would always check it to make
3 sure.

4 Q When did you start your trip for Ariel that
5 involved the accident on July 16th, 2019?

6 A I can't remember. I can't remember. We would
7 start out Mondays or Tuesdays here in Florida. We
8 would go and pick up loads in North Carolina, South
9 Carolina or Georgia.

10 Q Do you know if Ariel checked with an insurance
11 company before you started your run for him in July of
12 2019?

13 A I repeat again. I've been working for him for
14 a long time, and I don't know.

15 Q What -- you said that Ariel lives in a
16 different city in Cuba. Where does he live?

17 A They lived in the country. I lived in the
18 city. That's what they told me.

19 Q Did you ever go to a physical office location
20 where Ariel and his wife worked?

21 A Yeah, where Ariel, his wife and his son were.

22 Q What's his son's name?

23 A I can't remember. He was the last person who
24 was doing dispatch.

25 Q If you absolutely had to get in touch with

1 Ariel Calzada because he either had your truck or owed
2 you money, how would you go about it?

3 A What do you mean, my truck? My truck never
4 worked for Ariel, just me.

5 Q Okay. So if you had to get in touch with
6 Ariel Calzada for any reason, how would you do it?

7 A What do you mean? When? Now?

8 Q Yes. If you had to find him, how would you do
9 it?

10 A I don't know. Since the last time I saw him
11 in the yard, I haven't seen him since.

12 Q Do you still have phone numbers for him?

13 A No. I have changed telephones two years ago.
14 I've had several phones.

15 Q Did you get tax documents from any of
16 Mr. Calzada's companies for the tax year 2019?

17 A I don't think so. I didn't notice, but I
18 don't think so. Only whatever the lawyer has.

19 Q Do you know anyone who still drives for
20 Mr. Calzada?

21 A I don't know who works for him now, because I
22 haven't worked for him for a long time.

23 Q Do you know any of the drivers who worked for
24 him in July of 2019?

25 THE INTERPRETER: I'm sorry. The

1 interpreter needs repetition of the
2 question. I'm so sorry.

3 BY MS. WILLIS:

4 Q Okay. Do you know any of the drivers who
5 worked for Ariel in July of 2019?

6 A What I remember, I think I saw First Time was
7 owned by some people, some new people, but I don't know
8 who -- I don't remember their names.

9 Q I'm confused. What was owned by new people?

10 A Ariel opened several companies in several
11 different names, I think.

12 Q Okay. You mentioned that Ariel had companies
13 in other people's names. Do you know any of those
14 names?

15 A I don't know. I just saw when they sent it to
16 me. I knew a person. I didn't speak to him a lot, but
17 I knew him. And I saw his name on the company, the
18 First Time company. I don't know.

19 Q What is that name?

20 A I don't remember. They sent it to me the
21 other time, but I don't remember.

22 Q Who sent it to you?

23 A I don't remember if it was paperwork that was
24 sent to me from my lawyer or if it was paperwork from
25 the court -- I don't remember well -- when I was there

1 in Atlanta in the other courthouse. I can't remember.

2 Q Okay. Last thing. What are the names of some
3 of the codrivers you worked with when you were working
4 for Ariel?

5 A I can't remember names like that. I -- now I
6 don't remember anything about that.

7 Q How many --

8 A They learned a lot from me.

9 Q Who learned a lot from you?

10 A Many drivers were sent with me so they could
11 learn.

12 Q Okay. We're talking about just two years ago.
13 Who did you work for -- work with? Other than the
14 person you had only been with two times, who did you
15 regularly work with when you drove for Mr. Calzada?

16 A I repeat again. They would send several
17 drivers with me, new drivers. Some would stay, and
18 some would leave. I don't remember.

19 MS. WILLIS: No further questions.

20 MR. ANTOCI: I don't have any
21 questions. Thank you.

22 EXAMINATION

23 BY MR. ALLRED:

24 Q I just have a couple of questions.

25 Mr. Lobaina, my name is Bill Allred. I

1 represent one of the insurance companies in this case.

2 Really, it's just a recap. You were carrying
3 that day of the wreck plastic pallets?

4 A Yes. I think they were tall plastic pallets.

5 Q Okay. And your load was not hazardous; right?

6 A No. They were one on top of the other. I
7 think they were pallets, and they were high.

8 Q Okay. So your truck did not require a
9 hazardous load placard?

10 A I don't carry dangerous loads.

11 Q I see.

12 And so you picked up in South Carolina. Where
13 were you taking the load?

14 A I'll repeat again. I don't remember. I
15 picked it up in South Carolina, and I think it was
16 going to California.

17 Q Okay.

18 A The trips were always to California and then
19 back down to Miami.

20 Q Okay. Can you say with certainty that you
21 were not delivering the load in South Carolina?

22 A We would pick up from South Carolina, North
23 Carolina, Georgia, and then we would take it to
24 California.

25 Q Okay. So this trip would not have taken place 44

1 all within one state? Many states?

2 A What I'm saying is we would pick it up in
3 North Carolina, South Carolina, or Georgia. We would
4 only pick it up.

5 Q Okay. And all I'm trying to confirm is that
6 you were carrying freight in interstate commerce? You
7 were going between -- from one state to another state?

8 A We always go out from here, and we go to North
9 Carolina, Georgia, and then we go to California -- or
10 South Carolina. We go to California.

11 Q Right.

12 A We --

13 Q So this trip was like all the other trips?

14 A Yes. We always pick up a load in one city,
15 and we'll take it to California.

16 Q Okay.

17 MR. ALLRED: Thank you. That's what I
18 wanted to know.

19 MR. HARBIN: Anybody else have
20 questions?

21 MS. PARTRIDGE: I don't have any
22 follow-up.

23 MS. WILLIS: (Shakes head negatively.)

24 MR. ALLRED: Oh. You know what --

25 that's right. Go ahead. I'm done.

1 MR. HARBIN: Okay. I don't have any
2 questions for you, Mr. Lobaina.

3 THE INTERPRETER: Are we finished?

4 MS. PARTRIDGE: Yes.

5 Thank you for coming today,
6 Mr. Lobaina, working with us to get you on
7 Zoom today. We appreciate it.

8 THE VIDEOGRAPHER: The time is 1:43
9 p.m. We are off video record. This
10 concludes the videotaped deposition.

11 (OFF VIDEO RECORD.)

12 MR. HARBIN: We'll waive signature.

13 THE COURT REPORTER: If the attorneys
14 could let me know their transcript orders,
15 please.

16 MS. PARTRIDGE: I believe we'll just
17 do electronic for now.

18 MS. WILLIS: Electronic is fine.

19 MR. ALLRED: And, Charna, this is Bill
20 Allred. We'll take electronic.

21 (Deposition concluded at 1:43 p.m.)
22
23
24
25

C E R T I F I C A T E

I hereby certify that the foregoing transcript was reported remotely, as stated in the caption; that the witness was duly sworn and elected not to reserve signature in this matter; that the colloquies, questions and answers were reduced to typewriting under my direction; and that the foregoing pages 1 through page 47 represent a true, correct, and complete record of the evidence given.

I further certify that I am not disqualified for a relationship of interest under O.C.G.A. 9-11-28(c); that I am a Georgia Certified Court Reporter here as a representative of D'Amico & Associates, Inc.; that D'Amico & Associates was contacted by the party taking the deposition to provide court reporting services for this deposition; that I will not be taking this deposition under any contract that is prohibited by O.C.G.A. 15-14-37(a) and (b) or Article 7C of the Rules and Regulations of the Board; and by the attached disclosure forms I confirm that I/D'Amico & Associates is not a party to a contract prohibited by O.C.G.A. 15-14-37 or Article 7C of the Rules and Regulations of the Board.

The above certification is expressly withdrawn and denied upon the disassembly or photocopying of the foregoing transcript, unless said disassembly or photocopying is done under the auspices of D'Amico & Associates, Inc., and the signature and original seal is attached thereto.

This, the 27th day of August, 2021.



CHARNA S. PERLOE
Certified Court Reporter A-457.

	13:6,6,7,8,13; 18:25;19:1,19;21:16; 22:6,7;24:9;29:18,20, 23,25;31:7;33:13,21, 22;34:4,10,15,20,25; 35:14,17,24;36:4,13; 37:8;39:12,18;40:4, 10,15,20,21;41:1,4,6; 42:5,10,12;43:4	26:10 blue (1) 16:7 booklet (3) 24:24;25:3,6 brake (1) 27:25 brakes (1) 27:7 break (1) 32:20 breaking (1) 38:17 breakups (1) 38:20 Brittany (2) 7:9;8:13 broke (1) 15:10 broken (1) 21:2 brother (2) 30:6;32:8 brothers (2) 32:9,13 bus (1) 20:21 businesses (1) 31:18	28:22;30:1;31:10; 35:20 Carolina (16) 12:16,18,22,24; 23:20;40:8,9;44:12, 15,21,22,23;45:3,3,9, 10 carry (2) 24:10;44:10 carrying (2) 44:2;45:6 case (2) 9:12;44:1 cause (2) 27:11,24 ceiling (1) 22:18 Certainly (1) 37:23 certainty (1) 44:20 change (2) 39:20,21 changed (3) 39:23;40:2;41:13 Charna (1) 46:19 check (10) 14:12;17:23;24:13, 25;39:13,15,18,25, 25;40:2 checked (1) 40:10 checks (1) 14:11 CHR (2) 21:9,24 Chris (1) 7:20 citation (2) 29:1,9 cities (2) 37:9,10 city (4) 17:3;40:16,18; 45:14 clarification (4) 11:21;18:15;28:3; 30:5 class (1) 33:25 clear (1) 36:24 close (2) 21:23;22:1 closed (1) 21:5 codriver (10) 15:10,12,16;16:6; 20:11;26:2;38:15,25; 39:2,5 codrivers (1) 43:3	codriver's (1) 15:13 collided (1) 25:18 coming (5) 12:13,15;13:19; 35:20;46:5 commerce (1) 45:6 common (1) 34:5 communications (1) 31:10 companies (28) 13:23;14:1,7; 17:11,16;18:1,2,8; 21:5,7,11,13,16,17, 18,24;24:7,12;25:3; 30:18;31:4;39:13,15, 23;41:16;42:10,12; 44:1 Company (28) 7:21,24;12:25; 13:9,9,14,25;17:22, 25;18:5;21:4,15,19, 21;22:9;23:13,25; 24:19;25:5;30:12,14, 22;33:11,23;39:18; 40:11;42:17,18 concluded (1) 46:21 concludes (1) 46:10 conferring (2) 36:19,22 confirm (2) 28:22;45:5 confused (3) 35:9;38:13;42:9 connection (2) 11:12;38:17 contract (1) 17:12 Cordero (5) 19:3;21:14,14; 31:9,22 Corp (2) 21:23,24 Corporation (2) 21:9,9 counsel (2) 7:7;32:17 country (1) 40:17 couple (1) 43:24 course (2) 19:12;21:18 court (9) 8:1,4;9:8;29:4,5, 11;30:25;42:25; 46:13 courthouse (1)	
A					
able (1) 9:2 absolutely (1) 40:25 accept (3) 17:24;24:13,14 accident (15) 11:19;12:3;18:17, 19;20:24;28:10,14, 19;31:23;34:11;35:3, 14;38:14;39:5;40:5 accidents (1) 28:18 accounts (2) 10:25;11:3 additional (1) 33:11 address (4) 10:15,22;12:25; 31:17 afternoon (1) 33:19 Again (6) 32:7;35:7;37:22; 40:13;43:16;44:14 against (1) 31:21 ago (5) 21:6;22:3;31:25; 41:13;43:12 agree (3) 15:20;27:10,23 ahead (3) 8:16;25:12;45:25 al (2) 7:6,6 ALEX (6) 8:7,19,21,21;21:9, 23 Allred (8) 7:22;22:18;43:23, 25;45:17,24;46:19,20 almost (1) 36:5 along (1) 32:16 always (13) 17:16;24:12,13; 30:12;36:5,5;39:15, 16,24;40:2;44:18; 45:8,14 ANTOCI (3) 7:20,20;43:20 apologize (3) 28:15;32:12;37:12 apply (1) 27:7 appreciate (1) 46:7 Ariel (45)	Ariel's (4) 34:8;36:6,11;37:6 around (1) 29:19 aside (2) 25:22;31:2 asleep (1) 27:1 Atlanta (3) 9:13;12:3;43:1 attorney (1) 29:8 attorneys (1) 46:13 attorney's (1) 9:17 audio (1) 38:14 August (1) 7:3 auto (2) 24:11,17 Automobile (1) 33:10 aware (3) 9:1;24:7;31:21				
	B	C			
	back (14) 15:18;19:20,23; 22:17;23:3;25:16; 26:14;31:24;32:22; 33:6;35:16;36:3,7; 44:19 background (2) 36:18,25 bad (1) 11:12 band (1) 12:10 bassy (1) 13:19 behalf (2) 7:18,21 Ben (1) 7:17 better (2) 37:23;38:5 big (1) 12:20 Bill (2) 43:25;46:19 bleeding (1)	call (3) 8:23;29:17;39:9 called (2) 21:8;29:18 calling (1) 28:15 Calzada (25) 13:7,8;15:16;16:3; 17:7,21,25;18:24,25; 19:1,5,8,10,14,21,25; 21:14;23:10;31:9,22; 33:13;41:1,6,20; 43:15 Calzada's (1) 41:16 came (5) 19:15,20,23;31:24; 35:16 Can (15) 8:18;9:23;14:21, 22;16:12;21:8;22:15; 25:13;27:14;28:25; 29:16;32:1;37:19,25; 44:20 car (7) 22:4;26:2,18;			

43:1 cover (1) 18:6 coverage (1) 21:20 crash (1) 12:24 crashing (1) 27:1 Cuba (11) 10:10,18,19,20; 19:20,23;30:21; 31:24;35:16;37:8; 40:16 Cuban (2) 11:23,23 current (2) 10:15,22 currently (1) 19:8	documentation (1) 25:21 documents (1) 41:15 dollars (1) 21:20 done (1) 45:25 Donna (4) 7:13,15;33:9;35:6 down (1) 44:19 drive (4) 33:23,23;39:14,19 driven (2) 18:3,6 driver (5) 18:3;20:12,17; 34:2;39:7 drivers (6) 18:6;41:23;42:4; 43:10,17,17 drives (3) 18:3,4;41:19 driving (8) 12:8;14:20,25; 15:19;22:8;26:17; 27:5;33:25 drove (2) 15:5;43:15 duly (1) 8:8	Facebook (2) 11:4,5 fall (1) 27:1 family (1) 37:6 fan (1) 22:18 Farm (2) 7:16;33:10 feet (1) 27:4 fend (1) 18:17 find (3) 13:6;31:1;41:8 fine (5) 8:25;9:24;32:10; 33:20;46:18 finished (1) 46:3 First (16) 7:18;8:8;14:3,6; 15:20,23;17:9;20:23; 21:19;23:16,22; 27:18;31:2;33:21; 42:6,18 five (1) 31:8 five- (1) 32:20 fix (1) 37:18 fixed (2) 22:17;29:3 Florida (5) 10:16;17:5;21:11; 34:11;40:7 focusing (1) 17:18 follows (1) 8:9 follow-up (1) 45:22 forgetting (1) 33:17 form (1) 27:13 four (1) 31:7 Freddie (1) 9:12 freight (1) 45:6 friends (1) 34:7 front (3) 26:18;27:4,4 froze (1) 35:7 full (2) 8:18;11:7 further (2)	10:1;43:19 G Gaber's (2) 22:10,10 Gardens (2) 17:4,5 gave (1) 39:19 Georgia (8) 12:3;20:1,2;29:5; 40:9;44:23;45:3,9 given (3) 8:5;9:8,19 giving (1) 39:13 Good (3) 33:19;37:16;38:4 gosh (1) 33:16 great (1) 32:23 H happened (3) 12:12;20:11;30:7 HARBIN (6) 7:17,17;27:12; 45:19;46:1,12 hard (4) 11:11;28:1;34:23; 36:17 hat (2) 16:7,9 Hauling (3) 14:10;17:10;31:3 hazardous (2) 44:5,9 head (2) 30:3;45:23 headphones (1) 22:16 hear (2) 32:8,12 hearing (3) 22:13;34:23;36:20 heavy (6) 12:20;27:5;28:1,5, 5,7 help (1) 38:1 high (1) 44:7 hit (3) 12:10,13;26:8 home (1) 10:12 hotel (2) 20:19;39:6 hotels (1) 18:18	hour (1) 28:6 house (3) 10:5,6;19:9 hurt (1) 25:25 I identify (1) 7:7 impact (1) 15:3 impacted (1) 26:24 impacting (2) 26:13;27:7 important (1) 17:19 incident (1) 33:12 incorrect (1) 23:7 independently (1) 21:3 indicated (1) 8:6 injured (2) 26:2,5 inside (1) 37:24 Insurance (38) 7:21,24;17:22,23, 25;18:4,5,8,9,11; 21:17,18,19,21;24:7, 11,14,15,15,17,20,21, 23,25;25:2,5,7,10; 30:18,25;33:10; 39:13,16,18,21;40:1, 10;44:1 insure (1) 24:22 insured (2) 24:8;34:15 interpreter (54) 8:3,6,9;11:10,11, 13,20,20,22;12:5; 13:17,17,22;14:23; 16:11,11;18:14,14, 16;20:14,14,16; 22:12,12;27:15,15, 19;28:2,2,4;30:4,4,6; 33:15,19;34:22,22, 24;35:11;36:16,16, 19,20,22,23;37:2,3, 16,20;38:16,16; 41:25;42:1;46:3 interrupt (1) 38:9 interrupting (1) 37:13 Interstate (2) 12:4;45:6
D damage (1) 15:6 dangerous (1) 44:10 date (3) 7:2;12:2;38:13 day (20) 12:7,19;13:12,15; 15:19,25;17:20; 19:15,16,17;25:9,16, 22;26:6,11,15;31:6; 35:2,18;44:3 days (1) 30:2 defendant (1) 7:18 delivering (1) 44:21 dent (1) 15:4 deposition (6) 7:4;8:14;9:12,14; 46:10,21 depositions (1) 9:19 died (1) 30:6 different (8) 13:23,24,25;20:18; 37:9,10;40:16;42:11 difficult (1) 22:14 difficulty (1) 13:18 Directly (2) 29:12;30:1 dispatch (1) 40:24 distortion (1) 38:14	E easy (1) 28:6 either (1) 41:1 electronic (3) 46:17,18,20 else (3) 25:8;29:15;45:19 ended (1) 39:6 et (2) 7:6,6 EXAMINATION (3) 8:10;33:7;43:22 examined (1) 8:8 Excuse (6) 12:5;21:14;25:13; 27:17;32:10;33:15 Exhibit (2) 14:16,17 Express (3) 14:10;17:10;31:3 F face (2) 37:14,15			

into (3) 12:12;27:1;36:3	7:23;18:17,20,23; 20:17;26:17;31:15; 35:4,5;38:1;39:7	ma'am (1) 38:9	Mutual (1) 33:10	one (27) 9:13;11:6,13,14; 14:9;15:5;17:10; 18:7;19:14,15;20:20, 23;21:8;25:19;28:18, 23;31:3;34:15;35:4, 14;37:7,7;44:1,6; 45:1,7,14
involved (3) 11:17,25;40:5	license (2) 24:13;25:23	man (2) 19:2;39:9	myself (2) 18:18;38:3	only (12) 11:4;15:14;19:14, 15:25;7;31:7,24; 39:3,10;41:18;43:14; 45:4
Isabel (2) 19:2,3	light (1) 37:13	many (11) 21:22,25;22:3; 28:12,16;35:1;36:2; 38:20;43:7,10;45:1	N	opened (2) 21:19;42:10
Isidro (5) 7:5,18;8:7,19,21	lip (2) 12:11;26:8	marked (2) 14:16,17	name (19) 8:13,18,21;11:5,7, 9,22;13:24;15:13; 19:4;22:9;23:21; 25:5;33:9;39:2; 40:22;42:17,19; 43:25	operated (1) 31:18
J	live (4) 10:22;37:9,10; 40:16	Marlen (3) 17:4,4,4	names (14) 8:20;14:1;17:17; 18:6,7;21:7;23:24; 25:2;42:8,11,13,14; 43:2,5	orders (1) 46:14
job (1) 39:25	lived (2) 40:17,17	matter (1) 7:5	need (4) 11:2;27:19;35:2,17	originally (1) 16:23
July (40) 10:20,22;11:17; 12:1;14:2,20,25;17:9, 18;18:1;19:11,17; 20:7,23;22:1,4;23:9, 14;24:1,5,8,10,18,22; 25:3,6,9,16,25;26:3; 28:17,23;30:19;31:4; 38:14,25;40:5,11; 41:24;42:5	lives (3) 10:21;19:8;40:15	may (5) 7:22;9:1;32:16,19; 38:1	needs (7) 11:20;18:14;20:14; 27:15;28:2;30:4;42:1	otherwise (1) 8:6
K	living (1) 10:24	maybe (1) 22:15	negatively (1) 45:23	out (6) 24:20;30:18;31:18; 35:20;40:7;45:8
keep (3) 18:12;33:16;37:19	LL (2) 21:9,23	mean (4) 16:2;20:2;41:3,7	neither (1) 26:25	outside (3) 10:3,4;37:21
King's (16) 14:3,4,5,6,14; 15:23;17:10,14,15; 20:22;23:15,18,20, 21;24:8;31:2	load (23) 12:17,19,20,21,22; 13:1,5,23;18:10; 19:11;23:15,18,19, 21;24:1,4,22;28:5; 44:5,9,13,21;45:14	media (2) 10:25;11:3	nephew (2) 20:20,21	over (4) 26:19;27:3;28:21; 38:3
knew (5) 31:17;34:1,1; 42:16,17	loads (4) 13:16;15:23;40:8; 44:10	meet (4) 32:22;33:21,25; 35:17	nephew's (1) 21:2	owed (1) 41:1
known (1) 33:22	Lobaina (16) 7:5,6;8:7,19,22,24; 11:15;16:13;23:5; 28:16;30:9;32:6; 33:9;43:25;46:2,6	mentioned (1) 42:12	new (3) 42:7,9;43:17	own (4) 13:8;21:13;24:19; 35:24
knows (1) 24:9	located (1) 32:2	Merlin (3) 32:3,4,4	niece's (2) 22:8,9	owned (2) 42:7,9
L	location (1) 40:19	met (1) 35:3	noise (3) 22:13;36:17,24	owner (3) 13:7;17:8;19:13
last (11) 9:9,11;19:4,6,21; 20:22;29:23;31:17; 40:23;41:10;43:2	long (8) 11:14;15:2;23:23; 33:14;36:10,12; 40:14;41:22	Miami (3) 10:16;17:5;44:19	North (4) 40:8;44:22;45:3,8	P
later (1) 19:19	Look (7) 12:15;18:2;24:24; 25:7;27:25;29:18; 36:8	middle (1) 8:21	notice (2) 26:5;41:17	P-1 (1) 14:17
lawsuits (1) 31:21	looking (1) 16:22	miles (1) 28:6	numbers (1) 41:12	P-1 (1) 14:17
lawyer (9) 9:5;13:10;14:12; 17:12;27:18;29:10, 12;41:18;42:24	Looks (3) 15:1,4;37:17	million (1) 21:20	object (1) 27:13	page (2) 25:7,10
learn (1) 43:11	loss (1) 30:8	Mondays (1) 40:7	obstacles (2) 9:1,4	paid (7) 20:16,21;23:25; 24:4;29:3;30:10,14
learned (6) 23:6;33:22,23; 34:2;43:8,9	lot (8) 17:3;30:7;35:24; 36:3,6;42:16;43:8,9	money (1) 41:2	off (9) 16:25;22:20,23,24; 32:3;33:1,2;46:9,11	pallets (4) 12:20;44:3,4,7
leave (2) 31:15;43:18	loud (1) 22:13	months (4) 19:19,24;31:25; 34:11	office (2) 9:17;40:19	papers (1) 28:21
left (11)	Loyola (9) 7:18;8:7,12,19,22; 16:18,23;28:12,15	more (1) 19:24	officer (3) 28:8,20;29:14	paperwork (12) 13:4;18:11,13; 19:11;24:24;28:11; 30:20,23,24;31:1; 42:23,24
	M	Mrs (2) 7:11;8:15	Okeechobee (2) 31:20;32:3	park (1) 18:22
		Much (2) 38:5,19	Old (4) 7:21;10:24;11:15; 24:21	parked (2) 34:24,25
		musician (2) 12:10;26:9		
		must (1) 31:12		

<p>parking (1) 35:22</p> <p>PARTRIDGE (28) 7:9,10,13,22;8:11, 13,16,17;12:6;13:21; 14:18,22;16:17; 22:15,21;23:4;27:21, 22;32:5,11,15,21,24; 35:6;37:23;45:21; 46:4,16</p> <p>pay (3) 18:18;24:6;31:13</p> <p>payments (1) 14:9</p> <p>people (8) 16:14;18:19;20:9; 34:2,3;42:7,7,9</p> <p>people's (2) 17:17;42:13</p> <p>perimeter (1) 31:20</p> <p>person (4) 9:13;40:23;42:16; 43:14</p> <p>personal (4) 11:1,2;24:11,17</p> <p>personally (1) 29:5</p> <p>phone (3) 26:20;37:25;41:12</p> <p>phones (1) 41:14</p> <p>phonetic (1) 22:11</p> <p>photograph (1) 15:7</p> <p>physical (1) 40:19</p> <p>pick (10) 13:16,22;16:24; 20:18;39:8;40:8; 44:22;45:2,4,14</p> <p>picked (11) 12:17,22;13:1; 20:13,19;23:19,21; 24:5;30:15;44:12,15</p> <p>picking (1) 23:25</p> <p>placard (1) 44:9</p> <p>place (2) 15:24;44:25</p> <p>placed (1) 23:22</p> <p>Plaintiffs' (1) 14:17</p> <p>Plaintiff's (1) 14:16</p> <p>planted (1) 31:16</p> <p>plastic (4) 12:19,20;44:3,4</p> <p>play (1)</p>	<p>12:11</p> <p>player (1) 26:8</p> <p>please (6) 7:7;8:1,18;22:21; 38:8;46:15</p> <p>plug (1) 22:16</p> <p>pm (10) 22:23,25,25;23:3; 33:1,3,3,6;46:9,21</p> <p>pointing (1) 16:6</p> <p>police (9) 25:10,12,17,19,21; 28:8,10,20;29:14</p> <p>policies (1) 34:16</p> <p>prefer (1) 8:23</p> <p>presented (1) 7:7</p> <p>press (1) 14:21</p> <p>prevent (1) 9:2</p> <p>prior (5) 26:20;27:1,7; 28:17,23</p> <p>problem (4) 9:6;13:21;27:21; 38:11</p> <p>proceed (2) 8:2;38:8</p> <p>proof (1) 18:9</p> <p>prosecutor (1) 29:12</p> <p>provide (1) 18:9</p> <p>purposes (1) 37:24</p> <p>put (3) 11:8;18:11;38:3</p> <p>puts (1) 16:1</p>	<p>recap (1) 44:2</p> <p>receipt (1) 24:3</p> <p>receipts (2) 14:12,13</p> <p>received (3) 14:9,11;29:1</p> <p>Recess (2) 22:25;33:3</p> <p>recognize (2) 14:19,24</p> <p>RECORD (13) 7:1,8;22:20,23,24; 23:1,3;33:1,2,4,6; 46:9,11</p> <p>referring (4) 9:11;17:6;18:24,25</p> <p>register (1) 21:11</p> <p>registration (2) 25:20,22</p> <p>regularly (1) 43:15</p> <p>related (2) 36:13;37:5</p> <p>relationship (1) 33:12</p> <p>relatives (1) 34:4</p> <p>remember (67) 9:15,15;11:8,18,19, 25;12:2,2,15,17,23, 23,24;13:2;14:11; 15:8,14,22;16:8,21; 20:24;21:8,10,22,25; 22:8,10;23:16,23; 24:2;25:2,8,13,14,24; 26:12;28:25;29:16, 18,19,22,22,25;30:2, 20,21,22,24;31:8,19; 36:12;39:10,23;40:6, 6,23;42:6,8,20,21,23, 25;43:1,5,6,18;44:14</p> <p>remind (1) 33:17</p> <p>remotely (2) 8:3,9</p> <p>repeat (6) 9:5;32:1;38:21; 40:13;43:16;44:14</p> <p>repetition (5) 13:20;20:15;27:16, 19;42:1</p> <p>reporter (3) 8:1,4;46:13</p> <p>represent (5) 7:10,15;29:8; 33:10;44:1</p> <p>represents (1) 7:23</p> <p>Republic (2) 7:21;24:21</p>	<p>require (1) 44:8</p> <p>responding (1) 31:10</p> <p>result (1) 29:1</p> <p>right (11) 10:8,11;26:19; 27:3;33:21;35:15; 38:1,22;44:5;45:11, 25</p> <p>room (4) 7:23;20:17;37:13; 39:7</p> <p>Rostra (1) 11:23</p> <p>rule (1) 16:12</p> <p>run (1) 40:11</p> <p>running (1) 34:19</p>	<p>side (4) 15:3,21,24;20:21</p> <p>sign (1) 13:23</p> <p>signature (1) 46:12</p> <p>sister (1) 10:13</p> <p>sister's (1) 10:13</p> <p>six (1) 31:8</p> <p>sleeping (1) 15:12</p> <p>social (2) 10:25;11:3</p> <p>someone (2) 28:10;29:10</p> <p>son (1) 40:21</p> <p>son's (1) 40:22</p> <p>sorry (13) 11:10;13:20;30:8, 8;32:8,11,12;33:17; 38:9,10,21;41:25; 42:2</p> <p>sound (2) 13:19;37:24</p> <p>South (12) 12:16,18,22,24; 23:19;40:8;44:12,15, 21,22;45:3,10</p> <p>Southwest (1) 10:16</p> <p>Spanish (4) 8:3,9;29:11;37:2</p> <p>speak (6) 16:14;19:5;25:17; 29:14,20;42:16</p> <p>speaking (4) 13:18;16:15;37:3; 38:17</p> <p>specifically (1) 11:24</p> <p>spoke (6) 12:9;19:7;28:8; 29:11,13,25</p> <p>spouse (1) 10:18</p> <p>start (2) 40:4,7</p> <p>started (2) 21:15;40:11</p> <p>State (6) 7:16;8:18;33:10; 45:1,7,7</p> <p>stated (5) 10:18;17:15;19:21; 20:4;28:8</p> <p>states (1) 45:1</p> <p>stating (3)</p>
	R		S	
	<p>ran (1) 36:3</p> <p>reach (1) 30:18</p> <p>Really (1) 44:2</p> <p>rear-ended (1) 26:16</p> <p>rear-ending (3) 12:7;15:7;26:20</p> <p>reason (1) 41:6</p> <p>recall (1) 12:7</p>	<p>same (7) 9:8,9;11:6,13,14; 37:18;39:6</p> <p>sandals (1) 16:20</p> <p>saw (12) 19:6,21;29:23; 34:20,20;35:13,20; 39:10;41:10;42:6,15, 17</p> <p>saying (2) 28:19;45:2</p> <p>screen (1) 14:21</p> <p>second (1) 15:14</p> <p>seeing (1) 15:22</p> <p>send (1) 43:16</p> <p>sent (11) 13:10;14:12,13; 30:20,22,24;42:15, 20,22,24;43:10</p> <p>seven (3) 34:13,17,19</p> <p>several (8) 17:16;23:11;31:15; 35:23;41:14;42:10, 10;43:16</p> <p>Seymour (1) 20:1</p> <p>Shakes (1) 45:23</p> <p>show (1) 14:15</p> <p>shown (1) 15:6</p>		

15:6;23:7;28:13 stay (1) 43:17 stayed (2) 20:12,17 staying (1) 37:24 sticker (2) 15:20,24 still (6) 11:2;19:5;34:7; 36:20;41:12,19 stop (7) 18:21,22;20:10,20; 27:9;28:6,20 stopped (3) 27:4;34:13,17 stranded (2) 35:4,5 stubs (1) 14:12 summarize (1) 23:5 sure (10) 7:14;14:3,6;15:4; 16:13;19:24;24:25; 32:21;40:1,3 sworn (2) 8:4,8	three (1) 17:11 ticket (1) 29:6 times (2) 36:2;43:14 today (7) 8:14;9:3;17:18; 23:6;32:7;46:5,7 Today's (1) 7:2 told (3) 26:7;37:5;40:18 took (5) 18:19,20,21;20:9, 10 top (1) 44:6 touch (4) 14:22;34:7;40:25; 41:5 tow (4) 16:20;20:5;30:11, 15 Towing (3) 20:1,7,9 tractor (1) 16:5 traffic (1) 27:4 trailer (2) 30:10,15 transcript (1) 46:14 Transport (5) 7:19;15:20;17:10; 20:23;31:2 transporting (1) 18:10 tried (1) 27:9 trip (4) 15:15;40:4;44:25; 45:13 trips (2) 44:18;45:13 truck (48) 11:23;13:24;14:19, 24;15:19,25;16:20, 24;17:2,3;18:12,21, 22;19:7;20:10,18; 21:2;22:9,9;23:23; 24:25;25:20;27:6; 28:1,4,6;30:10,15; 34:10,12,12,15,17,20, 25;35:19,21,22,24; 36:3,5,7;39:14,19; 41:1,3,3;44:8 trucking (2) 18:1;20:1 trucks (9) 16:1,2;18:22; 29:24;34:14;35:25;	36:6,11;39:20 truck's (1) 28:11 trumpet (1) 26:8 try (1) 9:22 trying (1) 45:5 Tuesdays (1) 40:7 turn (1) 37:14 turned (1) 26:18 twice (2) 39:3,11 two (11) 19:19,24;21:5,16; 26:18;30:2;31:24; 32:9;41:13;43:12,14	W waited (1) 39:16 waive (1) 46:12 way (22) 9:23;14:4,5,7,9,14; 15:23;17:10,10,14, 15;20:23,23;23:15, 18,20;24:8;29:19; 31:2,3,13,13 Way's (1) 23:21 wearing (1) 16:9 welcome (1) 38:7 Wesco (2) 7:24;25:5 what's (2) 14:15;40:22 Whenever (2) 28:10;39:25 white (1) 15:4 whole (2) 13:9,9 who's (1) 10:7 wife (9) 10:9;19:2;36:13, 14;37:5,9,10;40:20, 21 WILLIS (22) 7:12,14;32:15,18, 23;33:8,9,16;35:8,10, 12;37:1,4;38:4,10,12, 22,23;42:3;43:19; 45:23;46:18 Wilson (21) 7:5,11,15;8:15,15; 12:8,9;15:7;22:2; 25:18;26:5,16,21,24; 27:2,8,10,23;28:23; 29:14;30:1 Wilson's (2) 26:10,13 window (1) 15:9 windshield (1) 15:9 within (1) 45:1 WITNESS (7) 16:16;32:9,14; 36:19,22;38:2,7 woman (4) 10:7,12,14;19:1 work (12) 10:8,14;13:10; 15:16;20:25;21:1;	22:7;24:14,16;43:13, 13,15 worked (16) 14:1;17:9;20:22; 21:16;23:9,11;24:12; 31:4,14;39:3;40:20; 41:4,22,23;42:5;43:3 workers (1) 31:14 working (13) 10:13;13:11,15; 17:20;21:2;22:6,8; 23:14;26:22;31:7; 40:13;43:3;46:6 works (1) 41:21 wreck (26) 11:17,18;12:1; 19:17;20:4;22:2,4; 25:9,16,25;26:2,6; 27:11,24;28:9,17,23; 29:2,13,17,20;30:1, 19;31:6,11;44:3 wrecks (2) 28:12,16 wrong (2) 27:11,24
T		U under (1) 34:15 unless (1) 8:6 unplug (1) 22:15 unsure (1) 23:13 up (26) 12:17,22;13:1,16, 22;16:24;20:13,18, 19;23:19,21;24:1,5; 30:15;31:16;36:24; 38:17;39:6,8;40:8; 44:12,15,22;45:2,4, 14 use (1) 11:9 used (1) 18:1	Y	
table (1) 38:3 talk (5) 12:13;25:12;26:22, 23;35:2 talked (2) 31:24;35:5 talking (1) 43:12 tall (1) 44:4 taught (1) 34:2 tax (2) 41:15,16 taxi (1) 20:20 telephones (1) 41:13 ten-minute (1) 32:20 term (1) 11:23 Terrace (1) 10:16 testified (2) 8:8;39:12 testimony (2) 9:7;35:13 texting (1) 26:24		van (2) 12:8;26:13 vehicle (1) 15:11 versus (1) 7:6 VIDEO (11) 7:1;22:23,24;23:1, 3;33:1,2,4,6;46:9,11 VIDEOGRAPHER (13) 7:2,25;22:19,22; 23:2;32:25;33:5; 37:11,12,17;38:5,8; 46:8 videotaped (2) 7:4;46:10	Ya (2) 14:23,23 y'all (1) 22:19 yard (17) 16:25;17:1;18:20; 19:6,15,22;20:1,5,7; 29:23;30:11,15; 31:25;32:1;34:10,21; 41:11 year (2) 36:12;41:16 years (15) 10:24;21:22,25; 22:3;23:12;31:8,15; 33:22;34:13,18,20; 35:1,23;41:13;43:12 YouTube (2) 11:4,9	
		V	Z	
			Zoom (1) 46:7	
			1	
			1 (1) 14:16 1:00 (2) 32:25;33:3 1:10 (3) 32:22;33:3,5	

<p>1:43 (2) 46:8,21</p> <p>103 (1) 31:20</p> <p>105 (1) 31:20</p> <p>11:48 (1) 7:3</p> <p>12:31 (4) 22:22,25,25;23:2</p> <p>15 (2) 16:5;35:25</p> <p>154 (2) 16:25;32:3</p> <p>16th (28) 11:18;12:1;14:20, 25:17;19:19;11,17; 20:8,23;22:2;23:9, 14;24:1,5,22;25:3,6, 9,17,25;26:3;28:17, 23;30:19;31:4;38:14, 25;40:5</p> <p>18 (2) 7:3;10:16</p>	<p>6</p> <p>65 (1) 28:5</p> <p>67 (1) 28:6</p> <p>8</p> <p>85 (3) 12:4,16;26:15</p> <p>9</p> <p>9220 (1) 10:16</p>			
2				
<p>20 (2) 16:5;35:25</p> <p>2015 (4) 14:13;17:12,13,15</p> <p>2019 (42) 10:20,23;11:18; 12:1;14:2,20,25;17:9, 19;18:1;19:11,17; 20:8,23;22:2,5;23:9, 14;24:1,5,8,10,18,22; 25:3,6,9,17,25;26:3; 28:17,24;30:19;31:4; 35:14;38:14,25;40:5, 12;41:16,24;42:5</p> <p>2021 (1) 7:3</p>				
3				
<p>33165 (1) 10:17</p>				
4				
<p>40 (1) 27:4</p>				
5				
<p>50 (1) 27:4</p> <p>54 (1) 11:16</p> <p>55 (1) 12:4</p>				